

ESEA Flexibility

Peer Panel Notes



State Request: Ohio

Date: 3/27/12

REVIEW AND EVALUATION OF REQUESTS

The U.S. Department of Education (Department) will use a review process that will include both external peer reviewers and staff reviewers to evaluate State educational agency (SEA) requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have during the on-site review. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA's request for this flexibility. If an SEA's request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA's request that need additional development in order for the request to be approved.

This document provides guidance for peer review panels as they evaluate each request during the on-site peer review portion of the review process. The document includes the specific information that a request must include and questions to guide reviewers as they evaluate each request. **Questions that have numbers or letters represent required elements.** The italicized questions reflect inquiries that reviewers will use to fully consider all aspects of an SEA's plan for meeting each principle, but do not represent required elements.

In addition to this guidance, reviewers will also use the document titled *ESEA Flexibility*, including the definitions and timelines, when reviewing each SEA's request. As used in the request form and this guidance, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Review Guidance

Consultation

1. Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of teachers and their representatives at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on input from teachers and their representatives?*

Consultation Question 1 Panel Response

Tally of Peer Responses: 4: Yes 2: No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> The narrative cites communications, meetings, and feedback sessions with educator groups, but is not specific about how the flexibility request has been informed by these sessions or about actions taken as a result of feedback from teachers and their representatives. The letters lacked specificity about the flexibility request.
<i>Strengths</i>	<ul style="list-style-type: none"> The Center for the Teaching Profession (CTP), a unit within the Ohio Department of Education (ODE), is focused on human capital improvement and has many mechanisms for communicating with stakeholders, including representatives of English Learners and students with disabilities subgroups. CTP is charged with this responsibility for consultation. In addition, staff from the Governor's Office conducted 18 meetings and an email mechanism was created. The request details some modifications that resulted from input.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> While the narrative cites appropriate teacher and educator groups, the nature of the consultation and input as well as specific changes made to the request in response to the input is not clear.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Explicitly state what changes were made to the request based on educator input, and include direct outreach to teachers, rather than solely through organizations. Moving forward, the SEA should continue its outreach efforts and should demonstrate what it has changed based on feedback.

2. Did the SEA meaningfully engage and solicit input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and

Indian tribes?

- *Is the engagement likely to lead to successful implementation of the SEA's request due to the input and commitment of relevant stakeholders at the outset of the planning and implementation process?*
- *Did the SEA indicate that it modified any aspect of its request based on stakeholder input?*
- *Does the input represent feedback from a diverse mix of stakeholders representing various perspectives and interests, including stakeholders from high-need communities?*

Consultation Question 2 Panel Response

Tally of Peer Responses: 4: Yes 2: No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE has formed an internal ESEA Flexibility Committee to seek input and oversee the development of the request. The stakeholders cited (pp. 13-14) represent the breadth needed in consideration of the request. While the ODE indicated that the feedback was useful, it did not indicate if specific modifications were made to the request.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE described and documented meeting dates with groups representing English Learners and students with disabilities, citing some of their concerns with adequate yearly progress (AYP) and testing practices. Additionally, charter schools, businesses, and business organizations were given an opportunity to provide input. Consultation with English Learners and students with disabilities was particularly strong (p. 15).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Some peers felt that the narrative fails to be specific on how consultation informed the flexibility request and others felt that details were not sufficient about representatives from English Learners and students with disabilities representative groups (p. 15). The SEA includes information on some of the concerns voiced by some of the stakeholder groups, such as English Learners and charter schools, but does not show how it modified things based on this input (pp. 15-16). The portal does not seem like a particularly effective communication tool given that it led to only 150-175 visits and comments out of Ohio's 110,000 teachers and 5,200 administrators.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should consider reviewing its protocols for seeking and utilizing input. Additionally, ODE might consider continuing to engage representatives from diverse communities during development and implementation of activities related to all three principles. Furthermore, ODE should demonstrate that it has carefully communicated and tried to address stakeholder concerns in a meaningful way. Finally, ODE should consider more in person outreach throughout the State (rather than conference calls).

Principle 1: College- and Career-Ready Expectations for All Students

Note to Peers: Staff will review 1.A Adopt College-And Career-Ready Standards, Options A and B.

1.B Transition to college- and career-ready standards

- 1.B Part A:** Is the SEA’s plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013–2014 school year realistic, of high quality?

Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part A

Tally of Peer Responses: 0: No 6: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE has adopted the Common Core State Standards (CCSS) with intent to implement them by 2013-14. ODE is in the process of determining the alignment gaps and transition requirements for moving from current to new standards.
<i>Strengths</i>	<ul style="list-style-type: none"> The Ohio legislature has approved bills demonstrating support for the movement to higher standards, including bills about “core” graduation requirements and a new college-and career-ready education system in English/language arts (ELA), mathematics, science, and social studies. ODE is undertaking an analysis of current vs. CCSS standards to prepare crosswalks for schools. Additionally, ODE has a logic model for communicating the process to others and for communicating outcomes.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE did not report interim progress data, nor was any mention made of efforts to evaluate the success of the transition and implementation plan. Furthermore, there was little mention of transition support provided for teachers of English Learners and students with disabilities.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> Given the number of standards, initiatives, and adoptions, Ohio may profit from continuing to coordinate and integrate the components into a single coherent plan to achieve college- and career-ready standards. ODE might consider continuing to refine the thinking around how to communicate their overarching reform plans as part of its theory of action (p. 22). ODE should develop clear plans to evaluate the success of implementation, including reporting interim data. Additionally, ODE should clearly articulate the professional development activities of all teachers of students with disabilities and English Learners to transition them to college and career level activities. Furthermore, ODE might consider providing more information on its plan to integrate standards into teacher and principal preparation programs. For example, what sort of evidence is the SEA seeking from teacher preparation programs to ensure that they adequately reflect and align with the rigor of CCSS (p. 38)?

Part B: Is the SEA's plan likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with the college- and career-ready standards?

Note to Peers: See ESEA Flexibility Review Guidance for additional considerations related to the types of activities an SEA includes in its transition plan.

1.B Panel Response, Part B

Tally of Peer Responses: 6 :No 0 :Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE is developing extended content standards based on the CCSS for students with disabilities for implementation in the 2013-14 school year. ODE recognizes the need to update English Learners proficiency expectations in response to the adoption of the CCSS standards.
<i>Strengths</i>	<ul style="list-style-type: none"> Ohio has become a participant in the State Collaborative on English Language Acquisition (SCELA). The new standards are scheduled for completion in July 2012. Additionally, the career and technical education component was strong and addressed the needs of special populations.

<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> The narrative on pp. 29 and 30 outlines the current direction, but provides little insight into implementation plans. Plans to prepare students and teachers to transition from the alternate assessment based on modified academic achievement standards (AA-MAAS) to the new assessment system are not presented. Based on review of the request and conversation with ODE staff, it appears that extended standards are applicable to all students with disabilities; usually these standards apply only to students with severe cognitive disabilities (e.g., those who are taking the alternate assessment based on alternate academic achievement standards (AA-AAAS)).
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE must redefine the student population for its extended standards to students with significant cognitive disabilities. ODE should use “people first” language (e.g., the term “students with disabilities” or “people with disabilities”) instead of “disabled students” here and throughout the proposal. ODE should explain why the percentage of students taking AP classes has declined and what steps it is taking to reverse this trend. ODE should clarify its plan to transition students and teachers from the AA-MAAS to the new standards and assessments.

1.C Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments that Measure Student Growth

- 1.C** Did the SEA develop, or does it have a plan to develop, annual, statewide, high-quality assessments, and corresponding academic achievement standards, that measure student growth and are aligned with the State’s college- and career-ready standards in reading/language arts and mathematics, in at least grades 3-8 and at least once in high school, that will be piloted no later than the 2013–2014 school year and planned for administration in all LEAs no later than the 2014–2015 school year, as demonstrated through one of the three options below? Does the plan include setting academic achievement standards?

Note to Peers: Staff will review Options A and C.

If the SEA selected Option B:

If the SEA is neither participating in a State consortium under the RTTA competition nor has developed and administered high-quality assessments, did the SEA provide a realistic, high-quality plan describing activities that are likely to lead to the development of such assessments, their piloting no later than the 2013–2014 school year, and their annual administration in all LEAs beginning no later than the 2014–2015 school year? Does the plan include setting academic achievement standards?

1.C, Option B Panel Response

☒ *Not applicable because the SEA selected 1.C, Option A or Option C*

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

Principle 1 Overall Review

Is the SEA's plan for transitioning to and implementing college- and career-ready standards, and developing and administering annual, statewide, aligned high-quality assessments that measure student growth, comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Principle 1 Overall Review Panel Response

Tally of Peer Responses: 0: Yes 6: No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE has demonstrated a comprehensive plan for transition and implementation by 2013-2014 and has considered subgroup needs and performance throughout the planning process. However, it is of great concern that the extended standards are applicable to all students with disabilities, which limits educational opportunities for the vast majority of students with disabilities. Additionally, there are no plans to transition from the AA-MAAS to the general assessment. Although ODE selected both Option A and Option B, Attachment 5 was not included in its initial submission.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE uses a theory of action to provide a basis for understanding the transition to college- and career-ready standards and assessments, as well as promising, evidence-based best practices including formative assessments and dual enrollment. The SEA is also taking steps to ensure that all students have access to a college- and career-ready curriculum by expanding dual enrollment and AP offerings and expanding CTE to align with CCSS standards. ODE uses a transition timeline that provides for full transition, including assessments, by 2014-2015. Students with disabilities and English Learners subgroups are considered throughout the transition planning phases.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is unclear how the SEA plans to transition its current assessments, including the AA-MAAS, over to the assessment being developed by the Partnership for Assessment of Readiness for College and Careers (PARCC) by 2014-2015. Additionally, it is problematic if all students with disabilities are participating in the extended standards system. • The percentage of students taking AP exams has declined by more than 12 percent; however, the request does not address this and cites it as a benefit with respect to increasing the number of underrepresented students among all AP students. It is also unclear to what extent increasing the numbers of students in AP classes is aligned with success in AP exams (p. 36). Some peers felt that there was a lack of educational soundness in using a “3” as a passing grade on an AP exam.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • Given the number of standards, initiatives, and adoptions, Ohio may profit from bringing together the components, and defining the new direction, in a single coherent plan to achieve college- and career-ready standards. ODE might consider continuing to refine the thinking around how to communicate their overarching reform plan as part of its theory of action (p. 22). ODE might consider developing clear plans to evaluate the success of implementation, including reporting interim data. ODE should demonstrate increased commitment to low-income populations through professional development, instructional materials, and resources. Additionally, ODE should clearly articulate the professional development activities of all teachers of students with disabilities and English Learners to transition them to college- and career-level activities. ODE should re-examine its decision to have extended standards to apply to all students with disabilities. Additionally, ODE should develop a plan to transition from the AA-MAAS to the general assessment. Furthermore, ODE might consider providing more information on its plan to integrate standards into teacher and principal preparation programs. For example, what sort of evidence is the SEA seeking from teacher preparation programs to ensure that they adequately reflect and align with the rigor of CCSS (p. 38)? ODE should use the term “students with disabilities” or “people with disabilities” instead of “disabled students”. ODE should explain why the percent of students taking AP classes has declined and what it is doing to reverse this trend.

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

2.A Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support

2.A.i Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012–2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students? (*note to Peers, please write to this question after completing 2.A.i.a and 2.A.i.b*)

2.A.i Panel Response

Tally of Peer Responses: 6:No 0:Yes

Response Component	Peer Panel Response
<i>Rationale</i>	<ul style="list-style-type: none"> ODE recognizes the need to unify its approach to accountability and the need to make the system understandable. To accomplish this, ODE proposes a letter grade system (F- A) to replace the six descriptive labels ranging from Academic Emergency to Excellent with Distinction. The new system will add several new performance measures, but will retain the Education Value Added Assessment System (EVAAS) value-added model. While subgroup performance is an important determination of letter grade designation, it is unclear what steps are being taken to ensure that all students and subgroups are represented in the accountability system.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE's plan includes differentiated recognition that recognizes excellence in several ways, as well as identifying problems, and differentiated levels of support. ODE's accountability system utilizes both formative and summative information and includes information from different levels in the State, including LEAs, schools, administrators, teachers, and students. ODE presented a clear method of calculating each letter grade. ODE's proposed additional measures are innovative and could have broad utility to other States.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE’s differentiated levels of support did not include much detail. Further thought may be needed as to how additional measures are calculated, including graduation rate. It is unclear to what extent value-added analysis adds to the transparency of the system. There are inconsistencies in the request with respect to which subgroups are disaggregated for reporting and accountability purposes. Additionally, it may be challenging to communicate the new system to ensure transparent reporting to educators and the public. It may be problematic that an insufficient participation rate discounts a letter grade in only the achievement and graduation gap performance measures – in other words, the participation rate is important and the consequence for noncompliance should be more severe. It is not clear that graduation rate constitutes a significant factor in the accountability system for all secondary schools.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE might consider providing further information on the differentiated levels of support that will be provided to districts. ODE should integrate the criteria for identifying focus and priority schools into computation of graduation rate in the overall accountability system. ODE should consider the development of standards-based definitions of what it means to earn each individual letter grade within this system. These definitions should be clearly communicated to educators, parents, students, relevant stakeholders, and the public. ODE should include all ESEA subgroups for reporting and accountability purposes. ODE should provide the rationale used to establish its “n size” at 30 and ensure that all students are included in the accountability system some way. ODE should provide ongoing monitoring and evaluation of the implementation of its accountability system. ODE should clearly articulate how graduation rate factors into the overall accountability score for secondary schools. ODE should ensure that participation rate is sufficiently accounted for in computation of individual measures and overall score in a way that promotes high levels of participation and should consider setting an absolute floor, or minimum level, that is acceptable.

- a. Does the SEA's accountability system provide differentiated recognition, accountability, and support for all LEAs in the State and for all Title I schools in those LEAs based on (1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion, for all students and all subgroups of students identified in ESEA section 1111(b)(2)(C)(v)(II); (2) graduation rates for all students and all subgroups; and (3) school performance and progress over time, including the performance and progress of all subgroups?

2.A.i.a Panel Response

Tally of Peer Responses : 6: *No* 0: *Yes*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • ODE's strategy categorizes school performance in relation to annual measurable objectives (AMOs) with a letter grade from A to F. • This rating system will be applied to both content areas and graduation rates. The same letter grade is applied to school performance and progress over time, including the performance of subgroups. There is an attempt to increase transparency in ODE's new system and add additional measures over time.
<i>Strengths</i>	<ul style="list-style-type: none"> • Table 2, Overall Cumulative Letter Grade Designations, provides a clear definition of the calculation criteria for assigning letter grades. The continued use of value-added analysis could be useful as part of an overall accountability system. Additionally, ODE tried to add transparency to student performance. ODE also used real student data and provided additional indicators, including: readiness, gifted performance, fiscal performance, non-academic performance, and measures of rigor (p. 49-50). ODE also plans to create a new index to identify the largest achievement gaps.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • It is unclear whether the use of value-added analysis adds to transparency. ODE's plan is dependent upon legislative action.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ODE should explain how it will ensure that the continued use of value-added analysis does not hinder its efforts to improve transparency around student performance. ODE should consider the development of standards-based definitions of what it means to earn each individual letter grade within this system. These definitions should be clearly communicated to educators, parents, students, relevant stakeholders, and the public. ODE should monitor carefully to ensure that the new system does represent a unified and transparent approach to accountability.

- b. Does the SEA's differentiated recognition, accountability, and support system create incentives and provide support that is likely to be

effective in closing achievement gaps for all subgroups of students?

2.A.i.b Panel Response

Tally of Peer Responses: 6: No 0: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE is proposing a unified system that aims to be more transparent and includes several innovative measures of performance and achievement. It is not yet clear how subgroups are included for reporting and accountability purposes in a way that ensures accountability for all students.
<i>Strengths</i>	<ul style="list-style-type: none"> Graphics 1-8 (pp. 54-59) demonstrate trends in subgroup performance gaps, including students with disabilities and English Learners, under the current system data release (2007–2011). The growth model EVAAS will still be a safe harbor option, but the highest rewards will still be reserved for the groups that make expected academic progress in the current year. ODE’s commitment to revisiting its business rules represents a best practice for ongoing development of the accountability system. Additionally, subgroup performance is an important determinant in final letter grade status (p. 68).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> On page 64 inconsistencies exist between the data provided in the graphs and the text. Furthermore, there are problems in the graduation rate calculations on page 67 that need to be reconciled. There are inconsistencies in the request with respect to which subgroups are disaggregated for reporting and accountability purposes. (See page 72 for an example). Additionally, it may be challenging to communicate the new system to ensure transparent reporting to educators, parents, and the public.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should clarify how English Learner students in their first two years of enrollment will be included in the accountability system across content areas (p. 59). Consider what additional status criteria is required to reconcile the graduation rate table on page 67. Clarify specifically which subgroups will be considered in the final subgroup analysis; ODE should include all ESEA subgroups for reporting and accountability purposes. ODE should provide the rationale used to establish its “n size” at 30 and ensure that all students are included in the accountability system some way. ODE should provide ongoing monitoring and evaluation of the implementation of its accountability system. ODE should provide further clarity around continued progress over time in districts that achieve independent status in order to be certain that all students are achieving at an acceptable level.

c. Note to Peers: Staff will review 2.A.i.c

Note to Peers: Staff will review 2.A.ii Option A.

ONLY FOR SEAs SELECTING OPTION B: If the SEA elects to include student achievement on assessments other than reading/language arts and mathematics in its differentiated recognition, accountability, and support system by selecting Option B, review and respond to peer review questions in section 2.A.ii. If the SEA does not include other assessments, go to section 2.A.iii.

2.A.ii Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?

- a. Note to Peers: Staff will review 2.A.ii.a
- b. Does the SEA's weighting of the included assessments result in holding schools accountable for ensuring all students achieve the State's college- and career-ready standards?
- c. Note to Peers: Staff will review 2.A.ii.c

2.A.ii.b PANEL RESPONSE

☒ Not applicable because the SEA selected 2.A, Option A

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	Selected Option A (p. 52). However, the Percentage of State Indicators Met (p. 46) includes reading, writing, mathematics, social studies, and science. An explanation of the inconsistency is needed.
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

2.B Set Ambitious but Achievable Annual Measurable Objectives

2.B Note to Peers: Staff will review Options A and B.

Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least

reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts through one of the three options below?

If the SEA selected Option C:

Did the SEA describe another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups?

- i. Did the SEA provide the new AMOs and the method used to set these AMOs?
 - ii. Did the SEA provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs?
 - iii. If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?
 - iv. Did the SEA attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups? (Attachment 8)
- *Are these AMOs similarly ambitious to the AMOs that would result from using Option A or B above?*
- *Are these AMOs ambitious but achievable given the State’s existing proficiency rates and any other relevant circumstances in the State?*
- *Will these AMOs result in a significant number of children being on track to be college- and career-ready?*

2.B, Option C (including Questions i–iv) Panel Response

☐ Not applicable because the SEA selected 2.B, Option A or Option B

Tally of Peer Responses: 6: Yes 0: No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE provides extensive analysis and honest interpretation of trend data on achievement gaps, including data from the State’s alternative assessment. The mechanisms for setting AMOs in mathematics and reading and for setting graduation targets are described in detail and defensible. ODE has set a goal of reducing by half the percentage of all students groups that are not proficient within six years. ODE described the methodology for computing state AMO targets, and then included a chart showing needed progress to achieve the new targets through 2016-17. All subgroups are to be evaluated against the AMO for all students (p. 60). AMOs are set in equal intervals until reaching the target.
<i>Strengths</i>	<ul style="list-style-type: none"> Plans for transitioning to new assessments are presented. Letter grade designations are easy to understand and well defined. 2011 data for districts, traditional public schools and community schools are presented and nicely illustrate the feasibility and utility of the system. Table 8 (p. 60) clearly shows the baseline for the new AMO targets and the needed progression. Using the method delineated on page 60, schools with lower proficiency rates would have to make bigger gains to reach the state targets. ODE included a chart showing average proficiency in reading and mathematics for all students, including subgroups (Att. 8, pp. 161-166).
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> There is concern that English Learner students are not adequately included during their first two years of enrollment in a school in the United States in the reading assessment, in contrast to ESEA regulations that focuses on English Learners in their first year of enrollment in a school in the U.S.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should clarify how it will ensure that students who are English Learners will be included in the accountability system in their first two years of enrollment in a school in the United States. ODE might consider setting subgroup goals to further ensure that subgroup performance is accounted for and represented.

2.C Reward Schools

2.C.i Did the SEA describe its methodology for identifying highest-performing and high-progress schools as reward schools?

2.C.i PANEL RESPONSE

Tally of Peer Responses: NA

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE proposes a system of determining reward schools that meets the ESEA flexibility definition that includes both Title I and Title I-eligible schools. Furthermore, it builds upon a system of support and recognition that ODE has had in place for a number of years.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE’s “Promise Schools” are recognized beyond ODE. ODE proposes to use reward schools as model sites.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It may be a challenge to communicate to parents and the public the differences between the current methods and the new methods of determining reward schools.
<i>Technical Assistance</i>	<ul style="list-style-type: none"> ODE should carefully consider communication plans to articulate the distinctions between various reward school classifications. ODE should consider creating a comprehensive plan to create more unity among its Reward school designations.

Note to Peers: Staff will review 2.C.ii.

2.C.iii Are the recognition and, if applicable rewards, proposed by the SEA for its highest-performing and high-progress schools likely to be considered meaningful by the schools?

➤ *Has the SEA consulted with LEAs and schools in designing its recognition and, where applicable, rewards?*

2.C.iii PANEL RESPONSE

Tally of Peer Responses: 6: No 0: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE has proposed a system of public recognition; however, there is no evidence that the rewards are meaningful. Additionally, ODE should clarify the relationship between current reward school designations and the ESEA flexibility reward school designation for purposes of public understanding.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE has a system of public recognition for schools including news releases and recognition at conferences (p. 73). ODE intends to collect and share best practices and put them on the SEA's website.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It does not appear that stakeholder input influenced the selection and design of reward mechanisms and no additional evidence was provided to indicate that the rewards were meaningful. ODE does not cite a financial reward system. While it will be useful to hold up these schools as examples, putting information on a website may not be sufficient.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE might consider clarifying the relationship between the current reward school designations and the ESEA flexibility reward school designation for purposes of public understanding. ODE should provide other ways of providing best practice sharing across schools throughout the State. ODE should consider financial rewards or additional flexibility options for reward schools.

2.D Priority Schools

Note to Peers: Staff will review 2.D.i and 2.D.ii.

2.D.iii Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in priority schools?

- a. Do the SEA's interventions include all of the following?
 - (i) providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;
 - (ii) ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;
 - (iii) redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;
 - (iv) strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;
 - (v) using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;
 - (vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and
 - (vii) providing ongoing mechanisms for family and community engagement?

2.D.iii.a (including questions (i)-(vii)) Panel Response*Tally of Peer Responses: 2: No 4: Yes*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE’s plan is generally aligned with the turnaround principles; however, the plan for support and monitoring of implementation is lacking sufficient detail.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE has a clear set of actions for intervention in priority schools. For those schools that are not being served through the School Improvement Grants (SIG) program, there is a choice of using the Ohio Intervention and Improvement (OII) model that provides a somewhat more flexible but rigorous intervention (Table 17, p. 78). Additionally, ODE’s proposed method for identifying priority schools actually identifies a group slightly larger than five percent of the State’s Title I schools. The intervention methods are sound and will be required for three years.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE presented no plans for supporting and monitoring implementation at the local school level.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should implement monitoring and support mechanisms for ensuring fidelity of implementation. ODE should also consider carefully how detailed information and expectations for each turnaround model will be communicated with schools and districts. ODE should provide more detail regarding how it will be determined whether a principal has the capacity to turn around a school in its OII model and who will make this determination.

b. Are the identified interventions to be implemented in priority schools likely to —

- (i) increase the quality of instruction in priority schools;
- (ii) improve the effectiveness of the leadership and the teaching in these schools; and
- (iii) improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

2.D.iii.b (including questions (i)-(iii)) Panel Response*Tally of Peer Responses: 4: No 2: Yes*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE’s intervention strategies are sound on face value but appear to lack meaningful state-level support and do not include specific information for addressing the needs of English Learners and students with disabilities.
<i>Strengths</i>	<ul style="list-style-type: none"> Eligible schools will be able to compete for SIG funding; to date, 85 schools have received SIG funding. Additionally, there are plans to provide technical assistance and additional supports to priority schools. ODE’s proposed interventions are aligned with turnaround principles.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> Although SIG implementation began in 2010, no data were provided on the progress of SIG schools thus far. The plan appears to lack meaningful state-level support and does not include specific information for addressing the needs of English Learners and students with disabilities. It is unclear whether schools that are currently SIG schools will have any additional supports from ODE. It is unclear who will provide support to the schools.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should provide data on schools currently involved in the improvement process. ODE should define its state-level support system and clarify who is going to be responsible for implementation and support. ODE should describe its plan for monitoring fidelity of implementation of its plan at the LEA and school level. ODE should consider and articulate the role of the Regional Education Support Centers (RESCs) in supporting priority schools.

c. Note to Peers: Staff will review 2.D.iii.c

2.D.iv Does the SEA’s proposed timeline ensure that LEAs that have one or more priority schools will implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year?

- *Does the SEA’s proposed timeline distribute priority schools’ implementation of meaningful interventions aligned with the turnaround principles in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?*

2.D.iv Panel Response*Tally of Peer Responses: 0: No 6: Yes*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE’s timeline requires newly implementing priority schools to begin implementation of interventions in the 2013-2014 school year (pp. 78-79).
<i>Strengths</i>	<ul style="list-style-type: none"> ODE provided a timeline and plans to provide additional technical assistance and resources to priority schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It is not possible from the information on page 79 to determine whether or not there will be a concentration of identified schools at the end of the three year-period.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE could further define and be more explicit about the technical assistance and support it intends to provide to priority schools.

2.D.v Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

- a. Do the SEA’s criteria ensure that schools that exit priority status have made significant progress in improving student achievement?
- *Is the level of progress required by the criteria to exit priority status likely to result in sustained improvement in these schools?*

2.D.v and 2.D.v.a PANEL RESPONSE*Tally of Peer Responses: 6: No 0: Yes*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> The exit criteria and timeline remain unclear.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE attempts to tie specific exit criteria to the initial method for identifying schools in priority status. ODE requires schools in priority school status to make sustained progress over several years; schools that fail to do so will be identified as persistently low-achieving.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE’s definition of exit criteria is minimal and insufficient.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should better clarify the timeline and criteria for exiting priority status, including: whether schools exit only after three years, and whether this lowest-performing five percent criterion used to identify priority schools is tied to a specific benchmark standard (p. 79). ODE should provide technical assistance surrounding priority school exit criteria.

2.E Focus Schools

Note to Peers: Staff will review 2.E.i, 2.E.i.a, and 2.E.ii

2.E.i Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as focus schools? If the SEA’s methodology is not based on the definition of focus schools in *ESEA Flexibility* (but is instead, *e.g.*, based on school grades or ratings that take into account a number of factors), did the SEA also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools Meet ESEA Flexibility Definitions” guidance?

- a. Note to Peers: Staff will review 2.E.i.a.
- b. Is the SEA’s methodology for identifying focus schools educationally sound and likely to ensure that schools are accountable for the performance of subgroups of students?

2.E.i.b Panel Response

Tally of Peer Responses: 0: No 6: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE’s methodology for identifying and monitoring focus schools is sound and includes subgroup metrics.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE’s submission included Table 18, Subgroup Proficiency and Graduation 85th Percentile Gaps (p. 81). ODE’s plan includes subgroup status in the final calculation. Additionally, a school may meet its AMO, but still be designated as a focus school based on subgroup performance.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It is not clear whether ODE’s subgroups are mutually exclusive.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ODE should clarify how subgroups are defined and whether subgroups are mutually exclusive.

2.E.ii *Note to Peers: Staff will review 2.E.ii*

2.E.iii Does the SEA’s process and timeline ensure that each LEA will identify the needs of its focus schools and their students and implement interventions in focus schools at the start of the 2012–2013 school year? Did the SEA provide examples of and justifications for the interventions the SEA will require its focus schools to implement? Are those interventions based on the needs of students and likely to improve the performance of low-performing students and reduce achievement gaps among subgroups, including English Learners and students with disabilities?

- *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as focus schools?*
- *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

2.E.iii Panel Response

Tally of Peer Responses: 5: No 1: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • ODE will publish the focus school identification list in August 2012 based on school year (SY) 2011-2012 performance results. Schools will be required to implement the Ohio Improvement Model with oversight from their LEA and regional SEA during the first semester of SY 2012-2013. It is unclear whether this timeline will enable LEAs to spend sufficient time diagnosing and preparing for implementation to occur during the first semester of SY 2012-2013.
<i>Strengths</i>	<ul style="list-style-type: none"> • ODE’s monitoring team will selectively check implementation of the interventions.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • ODE makes no mention of English Learners in this section of its request and there are no specific plans for how the needs of students with disabilities will be addressed in the process of implementing interventions in focus schools. Since ODE is not planning to identify schools as focus schools until August 2012, it is not clear that schools will be able to implement instructionally-focused interventions in the first semester.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should describe the supports that will be available to ensure that the needs of students with disabilities and English Learners will be addressed in the planning process. ODE should reconsider its proposed timeline for focus school identification to allow for implementation of focus school interventions by the first semester of SY 2012-2013. ODE might further consider adjusting its testing timeline or take other actions designed to shorten the timeline between test administration and data availability; however, ODE should be cautious of the potential this creates for a situation where schools are publically identified, given that much of this information will not be verifiable until the data are finalized. Some peers felt that ODE might further consider providing early notice to schools for early identification purposes; however, other peers expressed concern with this suggestion.

2.E.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

a. Do the SEA's criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?

➤ *Is the level of progress required by the criteria to exit focus status likely to result in sustained improvement in these schools?*

2.E.iv and 2.E.iv.a PANEL RESPONSE

Tally of Peer Responses: 6: No 0: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE attempts to tie its focus school exit criteria to the initial selection criteria; however, the timeline and exit criteria are insufficiently defined.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE attempts to align its exit criteria to its initial selection methodology.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> There is limited discussion and definition of exit criteria and timeline.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should better clarify the timeline and criteria for exiting focus status, including: the window of time schools have to demonstrate sufficient progress and whether this exit criterion is tied to a specific benchmark standard (p. 83). ODE should provide technical assistance surrounding focus school exit criteria. ODE should clarify key terms, including “enough”.

2.F Provide Incentives and Support for other Title I Schools

2.F.i Does the SEA’s differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps?

2.F.i Panel Response

Tally of Peer Responses: 5: No 1: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE’s system of incentives and supports will help to address gap goals and outcomes through data driven analysis and planning; however, it is unclear whether these efforts will be enough to improve student outcomes for all students, particularly students with disabilities and English Learners. It is not clear how AMOs will be used to identify interventions.
<i>Strengths</i>	<ul style="list-style-type: none"> The tables show application at the district level; however, an individual school earning an “F” will trigger movement of the district to high support. ODE has indicated how it intends to provide support for nearly 30 percent of LEAs. ODE intends to extend support for its community schools as well as for its traditional schools.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It is unclear how AMOs will be used to identify specific interventions for schools or districts. ODE proposes a district-level intervention strategy rather than a school-level intervention strategy for providing differentiated support and intervention.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should explain how AMOs and other performance data will be used to provide different levels of support for districts and schools. ODE should consider a monitoring and feedback structure for guiding schools through its system of supports to ensure that, where needed, schools and districts are implementing appropriate interventions.

2.F.ii Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for all students, including English Learners and students with disabilities?

2.F.ii Panel Response

Tally of Peer Responses: 6: No 0: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> It is not clear from the information provided that the incentives and supports are likely to improve student achievement, particularly for low-achieving students, English Learners, and students with disabilities.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE will provide assessments and diagnostic tools that should assist LEAs in efforts to address subgroup performance.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> No evidence is provided as to how the needs of students with disabilities and English Learners will be considered in the process of implementing interventions in focus schools. ODE's focus on districts rather than schools necessitates some mechanism to hold districts accountable for individual school performance. Some peers felt that the outcomes that are stated in the theory of action are not evident in this section.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should provide evidence that the system as proposed will result in the desired outcomes. ODE should develop a clearer method for holding districts accountable for individual school performance. ODE might think about using the outcomes in its theory of action to organize the SEA's plan to provide support and interventions to other Title I schools.

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Is the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?

- i. Is the SEA’s process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?

➤ *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and focus schools that is likely to result in the identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?*

- ii. Is the SEA’s process for ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?

- iii. Is the SEA’s process for holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools, likely to improve LEA capacity to support school improvement?

2.G (including i, ii, and iii) Panel Response

Tally of Peer Responses: 6: No 0: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE has reorganized to provide support for its lowest-performing schools. The list of teams, processes, and programs is impressive, but the narrative does not clarify how these efforts are tied together to achieve the desired improvements in student achievement. ODE attests to having a rigorous competitive process for selection and review for providers, but does not provide detail.
<i>Strengths</i>	<ul style="list-style-type: none"> Peers felt that the extent to which the SEA organizes around this challenge will determine the level of success in supporting schools to improve performance and close performance gaps. Additionally, ODE provides an extensive list of resources available to help build capacity.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> It is unclear to what extent ODE's list of services and supports fits together in a comprehensive manner. It is unclear how Title I or other funds will be used to promote improvement. Specific services related to students with disabilities and English Learners are not identified. ODE does not provide a timeline, sequencing, and/or a clearly articulated plan for the monitoring and implementation of intervention and support strategies.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE should distinguish services and supports for LEAs based on the individual LEA needs. ODE should further consider how to meet the needs of English Learners and students with disabilities. ODE should provide a timeline, sequencing, and/or a clearly articulated plan for the monitoring and implementation of intervention and support strategies.

Principle 2 Overall Review

Is the SEA's plan for developing and implementing a system of differentiated recognition, accountability, and support likely to improve student achievement, close achievement gaps, and improve the quality of instruction for students? Do the components of the SEA's plan fit together to create a coherent and comprehensive system that supports continuous improvement and is tailored to the needs of the State, its LEAs, its schools, and its students? If not, what aspects are not addressed or need to be improved upon?

PRINCIPLE 2 OVERALL REVIEW PANEL RESPONSE

Tally of Peer Responses: 6: No 0: Yes

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> ODE suggests the need to create a unified plan, but does not in the narrative show a clear path to achieving that unity. The plan does promote an improved use of data and indicators to measure school performance and progress. However, the SEA organization and supports seem to lack the recognized need for unity. The overall plan seems to miss the opportunity to clarify and focus school improvement efforts.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE's plan includes differentiated recognition that recognizes excellence in several ways, as well as identifying problems and differentiated levels of support. Nearly 35 percent of LEAs will receive some level of support and intervention from ODE.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE did not demonstrate how it is evaluating current interventions and creating new ones to achieve desired outcomes. ODE's current proposal is neither comprehensive nor coherent.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE, LEA, and school personnel should be clear about the policy and the specific activity/program goals. ODE should articulate a plan, tied to its theory of action, which allows it to achieve its desired goals.

Principle 3: Supporting Effective Instruction and Leadership

3.A Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems

3.A.i Has the SEA developed and adopted guidelines consistent with Principle 3 through one of the two options below?

If the SEA selected **Option A**:

If the SEA has not already developed and adopted all of the guidelines consistent with Principle 3:

- i. Is the SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems likely to result in successful adoption of those guidelines by the end of the 2011–2012 school year?

3.A.i, Option A.i Panel Response

☐ *Not applicable because the SEA selected 3.A, Option B*

Tally of Peer Responses: 6: Yes 0: No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> The SEA's plan for developing and adopting guidelines for local teacher and principal evaluation and support systems is likely to result in successful adoption of those guidelines by the end of SY 2011–2012 in part because the work in this area will be a continuation of Ohio's demonstrated commitment to teacher effectiveness as evidenced by a series of actions since 2005, including passage of HB 153. The lofty goals included in the State's Race to the Top application remain the foundation for the Ohio's efforts to improve in this area.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Strengths</i>	<ul style="list-style-type: none"> The guidelines are formally being adopted in July 2012 and the implementation timeline (as described on pp. 105-106) seems thorough and reasonable. It includes important steps related to training and piloting that will increase the likelihood of success. It is promising that Battelle will be involved in pilot activities. Additionally, ODE provided a deadline by which local boards of education must pass ODE's guidelines.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE needs more information on technical assistance to districts. ODE may also need to do more than provide a clearinghouse of best practices.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE needs to demonstrate alignment of locally-designed systems and to determine what measures may be used for untested grades and subjects. These are major issues and getting them right will be essential for the success of the new evaluation system (p. 103).

- ii. Does the SEA's plan include sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, Option A.ii Panel Response

☒ *Not applicable because the SEA selected 3.A, Option B*

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

- iii. *Note to Peers: Staff will review iii.*

If the SEA selected **Option B**:

If the SEA has developed and adopted all guidelines consistent with Principle 3:

- i. Are the guidelines the SEA has adopted likely to lead to the development of evaluation and support systems that increase the quality of instruction for students and improve student achievement? (See question 3.A.ii to review the adopted guidelines for consistency with Principle 3.)

3.A.i, Option B.i Panel Response

☒ *Not applicable because the SEA selected 3.A, Option A*

Tally of Peer Responses: X Yes, X No

Response Component	Peer Panel Response
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

ii. Note to Peers: Staff will review ii.

iii. Did the SEA have sufficient involvement of teachers and principals in the development of these guidelines?

3.A.i, Option B.iii Panel Response

☐ *Not applicable because the SEA selected 3.A, Option A*

Tally of Peer Responses: 3: Yes 3: No

Response Component	Peer Panel Response
Rationale	<ul style="list-style-type: none"> There has been significant outreach to stakeholders but it is unclear how much stakeholder involvement shaped – or did not shape – the new systems.
Strengths	<ul style="list-style-type: none"> ODE's outreach included: 73 principals participated in focus groups; 72 principals participated in train-the-trainers sessions (att. 7); 140 teachers and 120 evaluators participated in field testing of the model in 138 LEAs (att. 8); 18 meetings between the Governor's staff and teachers were held across the state.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE is presently piloting its system in 138 schools; however, no rubrics were provided in conjunction with this information. There seems to be an inconsistency between the level of detail provided in the narrative and the components of the pilot system. ODE included only eight participants in its rubric design meetings. It is unclear to what extent the stakeholders' input, including educator input, has actually shaped the new teacher and principal evaluation systems, including: what ideas were generated or refined in these meetings that improved the proposed system? The contents and function of ODE's rubrics are unclear. It is unclear to what extent teachers of students with disabilities and English Learners will be included in this system. Additionally, it is unclear to what extent student data concerning students with disabilities and English Learners will be included in this system.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE needs to add examples of the content of stakeholder feedback (i.e., what did they like/agree with in the new systems and what were their concerns?). ODE should explain the extent to which stakeholder concerns were addressed, or not, and why. ODE should develop a comprehensive timeline illustrating the plan for implementation by SY 2014-2015. ODE should ensure opportunities for ongoing educator involvement in design, implementation, and refinement of evaluation systems.

ONLY FOR SEAs SELECTING OPTION B: If the SEA has adopted all guidelines for local teacher and principal evaluation and support systems by selecting Option B in section 3.A, review and respond to peer review question 3.A.ii below.

3.A.ii Are the SEA's guidelines for teacher and principal evaluation and support systems consistent with Principle 3 — *i.e.*, will they promote systems that:

a. Will be used for continual improvement of instruction ?

➤ *Are the SEA's guidelines likely to result in support for all teachers, including teachers who are specialists working with students with disabilities and English Learners and general classroom teachers with these students in their classrooms, that will enable them to improve their instructional practice?*

3.A.ii.a Panel Response

☒ *Not applicable because the SEA selected 3.A, Option A*

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

b. Meaningfully differentiate performance using at least three performance levels?

- *Does the SEA incorporate student growth into its performance-level definitions with sufficient weighting to ensure that performance levels will differentiate among teachers and principals who have made significantly different contributions to student growth or closing achievement gaps?*

3.A.ii.b Panel Response

☒ *Not applicable because the SEA selected 3.A, Option A*

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

- c. Use multiple valid measures in determining performance levels, including as a significant factor data on student growth for all students (including English Learners and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources, such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys)?
- (i) Does the SEA have a process for ensuring that all measures that are included in determining performance levels are valid measures, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA?

3.A.ii.c(i) Panel Response

☒ Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: X Yes, X No

Response Component	Peer Panel Response
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

- (ii) For grades and subjects in which assessments are required under ESEA section 1111(b)(3), does the SEA define a statewide approach for measuring student growth on these assessments?

3.A.ii.c(ii) Panel Response

☒ Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: X Yes, X No

Response Component	Peer Panel Response
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

- (iii) For grades and subjects in which assessments are not required under ESEA section 1111(b)(3), does the SEA either specify the measures of student growth that LEAs must use or select from or plan to provide guidance to LEAs on what measures of student growth are appropriate, and establish a system for ensuring that LEAs will use valid measures?

3.A.ii.c(iii) Panel Response

☒ Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: X Yes, X No

Response Component	Peer Panel Response
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

- d. Evaluate teachers and principals on a regular basis?

3.A.ii.d Panel Response

☒ Not applicable because the SEA selected 3.A, Option A

Tally of Peer Responses: X Yes, X No

Response Component	Peer Panel Response
Rationale	
Strengths	
Weaknesses, issues, lack of clarity	
Technical Assistance Suggestions	

- e. Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development?
- *Will the SEA's guidelines ensure that evaluations occur with a frequency sufficient to ensure that feedback is provided in a timely manner to inform effective practice?*
 - *Are the SEA's guidelines likely to result in differentiated professional development that meets the needs of teachers?*

3.A.ii.e Panel Response

☒ *Not applicable because the SEA selected 3.A, Option A*

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

- f. Will be used to inform personnel decisions?

3.A.ii.f Panel Response

☒ *Not applicable because the SEA selected 3.A, Option A*

Tally of Peer Responses: X Yes, X No

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	
<i>Strengths</i>	
<i>Weaknesses, issues, lack of clarity</i>	
<i>Technical Assistance Suggestions</i>	

3. B Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems

- 3.B** Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems?
- *Does the SEA have a process for reviewing and approving an LEA's teacher and principal evaluation and support systems to ensure that they are consistent with the SEA's guidelines and will result in the successful implementation of such systems?*
 - *Does the SEA have a process for ensuring that an LEA develops, adopts, pilots, and implements its teacher and principal evaluation and support systems with the involvement of teachers and principals?*
 - *Did the SEA describe the process it will use to ensure that all measures used in an LEA's evaluation and support systems are valid, meaning measures that are clearly related to increasing student academic achievement and school performance, and are implemented in a consistent and high-quality manner across schools within an LEA (i.e., process for ensuring inter-rater reliability)?*
 - *Does the SEA have a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA's teacher and principal evaluation and support systems?*
 - *Is the SEA's plan likely to be successful in ensuring that LEAs meet the timeline requirements by either (1) piloting evaluation and support systems no later than the 2013–2014 school year and implementing evaluation and support systems consistent with the requirements described above no later than the 2014–2015 school year; or (2) implementing these systems no later than the 2013–2014 school year?*
 - *Do timelines reflect a clear understanding of what steps will be necessary and reflect a logical sequencing and spacing of the key steps necessary to implement evaluation and support systems consistent with the required timelines?*
 - *Is the SEA plan for providing adequate guidance and other technical assistance to LEAs in developing and implementing teacher and principal evaluation and support systems likely to lead to successful implementation?*
 - *Is the pilot broad enough to gain sufficient feedback from a variety of types of educators, schools, and classrooms to inform full implementation of the LEA's evaluation and support systems?*

3.B Panel Response*Tally of Peer Responses: 6: Yes 0: No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> The new evaluation system will be the core of a comprehensive approach for improving teacher and principal quality and effectiveness. It will be used not only for hiring and placement but also for professional development, equitable distribution, differentiated roles and responsibilities, and performance-based compensation and tenure decisions.
<i>Strengths</i>	<ul style="list-style-type: none"> Through its Race to the Top application, ODE developed a process for ensuring its LEAs develop, adopt, and pilot teacher and principal evaluation and support systems with the involvement of teachers and principals. All local boards of education are required to adopt policies with input of teacher and principals that comply with the state framework by July 1, 2012. Implementation is slated for SY 2013-2014 (p. 107). ODE requires its LEAs to meet the timeline requirements by developing a process for LEAs to submit documentation of the implementation date prior to the July 1 deadline required by Ohio's state law. Presumably this means implementation will occur starting in SY 2013-2014 (p. 107). ODE's timelines reflect awareness of what steps will be necessary to implement evaluation and support systems consistent with the required timelines. For example, the timelines include important steps such as conducting an external evaluation to get feedback through focus groups and surveys, looking at inter-rater reliability, and planning for use of data to support instructional and human capital decisions, etc. The process also ensures a demonstrated commitment to sufficient training and credentialing for evaluators, which is an essential step in the process (p. 108).

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • ODE did not describe in sufficient detail the process used in field testing to ensure that all measures used in an LEA's evaluation and support systems are valid. It is not clear that there is a process for ensuring inter-rater reliability, nor is it clear who even did the field testing (i.e., were there external validators?). • Union leaders' signatures do not necessarily indicate support from rank and file teachers. ODE's request also lacks sufficient detail as to when and how teachers will be included as the process of developing and implementing the evaluation systems continues (p. 107). • ODE does not demonstrate that it has a process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA's teacher and principal evaluation and support systems.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> • ODE should add further detail on the process that will be used in field testing to ensure that all measures used in an LEA's evaluation and support systems are valid, especially to ensure inter-rater reliability. • ODE should demonstrate that it has an adequate process for ensuring that teachers working with special populations of students, such as students with disabilities and English Learners, are included in the LEA's teacher and principal evaluation and support systems.

Principle 3 Overall Review

If the SEA indicated that it has not developed and adopted all guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option A in section 3.A, is the SEA's plan for the SEA's and LEAs' development and implementation of teacher and principal evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

If the SEA indicated that it has adopted guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by selecting Option B in section 3.A, are the SEA's guidelines and the SEA's process for ensuring, as applicable, LEA development, adoption, piloting, and implementation of evaluation and support systems comprehensive, coherent, and likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Principle 3 Overall Review Panel Response*Tally of Peer Responses: 5: Yes 1: No*

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> The new evaluation system can be a critical component of ODE's efforts to increase student achievement through improving teacher and principal quality and effectiveness. The reforms underway in this area are likely to yield improvements in decisions related to hiring, placement, professional development, equitable distribution of teachers, differentiated roles, performance-based compensation, and tenure.
<i>Strengths</i>	<ul style="list-style-type: none"> ODE's guidelines are formally being adopted in July 2012 and the implementation timeline (as described on pp. 105-106) seems thorough and reasonable. It includes important steps related to training and piloting that will increase the likelihood of success.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> ODE needs more information on the technical assistance that will be provided to districts. ODE may also need to do more than provide a clearinghouse of best practices. Details were not provided as to specific development of new growth measures and support for fidelity of implementation. No plans are evident for continued solicitation of stakeholder input.
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none"> ODE needs to demonstrate a process for ensuring alignment of locally-designed systems with its guidelines. ODE should, in conjunction with educators, determine what measures may be used for untested grades and subjects. ODE should describe a process for continued stakeholder input.

Overall Request Evaluation

Did the SEA provide a comprehensive and coherent approach for implementing the waivers and principles in its request for the flexibility? Overall, is implementation of the SEA's approach likely to increase the quality of instruction for students and improve student achievement? If not, what aspects are not addressed or need to be improved upon?

Overall Request Evaluation Panel Response

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Rationale</i>	<ul style="list-style-type: none"> • ODE has developed a comprehensive plan for transition to college- and career-ready standards and implementation by 2013-14; a differentiated accountability system that takes into consideration supports and interventions for all schools; and is progressing towards development and implementation of teacher and principal evaluation systems. Concerns exist surrounding the limited representation of students with disabilities, English Learners, and low-performing students throughout the plan in ways that will fully include and support their improved achievement.
<i>Strengths</i>	<ul style="list-style-type: none"> • ODE uses a theory of action to organize and communicate the system to stakeholders. • This flexibility request addresses the requirements, except for one attachment that is still expected. • While stakeholder outreach was evident and ranged from legislators to classroom teachers and parents, it is not clear to what extent stakeholder feedback was used to shape the request. • The various activities were generally reasonable and should move the state towards accomplishing its designated goals and tasks.
<i>Weaknesses, issues, lack of clarity</i>	<ul style="list-style-type: none"> • ODE should demonstrate increased commitment to high-needs populations, including low-income students, students with disabilities, and English Learners. Extended standards are applicable to a group of students with disabilities that is too broad. • ODE did not demonstrate appropriate alignment between the interventions and desired outcomes in the differentiated recognition, accountability and supports. • The timelines were often unclear or overly ambitious and should be carefully considered in order to move ODE toward accomplishing the designated goals and tasks.

<i>Response Component</i>	<i>Peer Panel Response</i>
<i>Technical Assistance Suggestions</i>	<ul style="list-style-type: none">• ODE should articulate a unified, coherent, and inclusive plan, tied to the State’s theory of action, that will facilitate Ohio’s ability to achieve its goals.